

DORSEY & WHITNEY LLP  
J. Michael Keyes (SBN 262281)  
*keyes.mike@dorsey.com*  
Connor J. Hansen (*pro hac vice*)  
*hansen.connor@dorsey.com*  
701 Fifth Avenue, Suite 6100  
Seattle, WA 98104  
Telephone: 206.903.8800  
Facsimile: 206.903.8820

DORSEY & WHITNEY LLP  
Kent J. Schmidt (SBN 195969)  
*schmidt.kent@dorsey.com*  
600 Anton Boulevard, Suite 200  
Costa Mesa, CA 92626  
Telephone: 714.800.1400  
Facsimile: 714.800.1499

*Attorneys for Plaintiff AXS Group LLC*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

AXS GROUP LLC,  
Plaintiff,

v.

EVENT TICKETS CENTER, INC.,  
VIRTUAL BARCODE DISTRIBUTION  
LLC, ALTAN TANRIVERDI, and  
SECURE.TICKETS,

Defendants.

Case No. 2:24-CV-00377-SPG (Ex)

**DECLARATION OF J. MICHAEL  
KEYES IN SUPPORT OF  
UNOPPOSED MOTION FOR  
LEAVE TO FILE SECOND  
AMENDED COMPLAINT**

Filed concurrently with:

1. Unopposed Notice of Motion and Motion for Leave to File Second Amended Complaint and Memorandum of Points and Authorities in Support Thereof;
2. [Proposed] Order

Honorable Sherilyn Peace Garnett

Date: December 4, 2024

Time: 1:30 p.m.

Courtroom: 5C

First Amended Complaint filed:

May 10, 2024

1 I, J. Michael Keyes, declare as follows:

2 1. I am an attorney duly admitted to practice law in the State of California.  
3 I am a partner with the law firm Dorsey & Whitney, LLP, and counsel of record for  
4 Plaintiff AXS Group, LLC in the above-captioned action. I make this declaration  
5 based on my personal knowledge of the facts set forth herein and in support of  
6 Plaintiff's Unopposed Motion for Leave to File Second Amended Complaint.

7 2. Attached hereto as **Exhibit 1** is a copy of the Second Amended Verified  
8 Complaint that Plaintiff seeks leave to file. The exhibits to the Second Amended  
9 Verified Complaint are included in Exhibit 1. This version of the Second Amended  
10 Verified Complaint includes redactions for content that Plaintiff previously filed  
11 under seal. Plaintiff will seek leave to file an un-redacted version under seal.

12 3. Attached hereto as **Exhibit 2** is a redlined copy of the Second Amended  
13 Verified Complaint, showing how it compares to Plaintiff's previously filed First  
14 Amended Verified Complaint. This exhibit also includes redacted content consistent  
15 with Plaintiff's prior filings.

16 4. Plaintiff filed its initial Complaint in this matter on January 16, 2024.

17 5. Plaintiff filed a First Amended Complaint on May 6, 2024, before any  
18 party filed an answer to its original Complaint. The First Amended Complaint was  
19 filed after Defendants received responses to Rule 45 subpoenas issued to domain  
20 name registrars for the domain names Verified-Ticket.com and Amosa.App. The  
21 First Amended Complaint named the owners of these domains, Virtual Barcode  
22 Distribution LLC ("VBD") and Altan Tanriverdi, respectively.

23 6. After filing the initial Complaint, I participated in settlement discussion  
24 with counsel for Internet Referral Services LLC ("IRS") and, separately, with counsel  
25 for Event Tickets Center, Inc. ("ETC").

26 7. During these settlement discussions, Plaintiff learned that counsel for  
27 ETC also represents TicketNetwork Inc. ("TNI"). A representative of TNI  
28

1 participated in some of the settlement discussions that I and my colleague had with  
2 counsel for ETC and TNI.

3 8. Plaintiff began investigating TNI and its role in the conduct alleged in  
4 the Complaint during and following these settlement discussions.

5 9. My colleague Connor Hansen conducted a meet and confer with counsel  
6 for ETC and VBD on October 10, 2024 to discuss Plaintiff's Second Amended  
7 Verified Complaint. That conference was conducted via Zoom. Mr. Hansen then  
8 followed up with counsel for ETC and VBD via email, on which I was cc'd, on  
9 October 15, 2024 to confirm whether they would oppose this motion. In response,  
10 counsel for both ETC and VBD indicated that they will not oppose this motion.

11  
12 I certify under penalty of perjury under the laws of the United States that the  
13 foregoing is true and correct.

14 This declaration was executed on October 31, 2024 in Spokane, Washington.

15  
16 By: /s/ J. Michael Keyes  
J. Michael Keyes, SBN 262281

17 *Attorneys for Plaintiff*  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

I hereby certify that on October 31, 2024, a true and correct copy of the foregoing was filed electronically using the Court's CM/ECF system, which shall send notification of such filing to all counsel of record. Any counsel of record who has not consented to electronic service through the Court's CM/ECF system will be served by electronic mail.

/s/ J. Michael Keyes  
J. Michael Keyes, SBN 262281